



Alabama Department of Environmental Management
adem.alabama.gov

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December 16, 2015

Ms. Beverly H. Banister
Director
Air, Pesticides, and Toxics Management Division
US EPA Region IV
61 Forsyth Street
Atlanta, GA 30303-8960

Dear Ms. Banister:

The Department is in receipt of your comments and suggestions regarding the 2015 Alabama Ambient Air Monitoring Network Plan.

With respect to your comment concerning the PM_{2.5} FEM monitor data at the North Birmingham site (AQS ID 01-079-0023), while the statistical review of the data comparison between the FEM and the FRM monitors may fall within the parameters allowed by EPA, JCDH and the Department are concerned with the positive bias introduced by the FEM monitor. JCDH is considering daily FRM PM_{2.5} monitoring at this site.

Regarding the removal of the PM_{2.5} monitor at the Pelham School location, the Department had worked diligently to relocate the site to another location on the school property or to other nearby locations in the area. However, the owner of the location requested that the monitor be removed with minimal notice. This did not provide sufficient time to arrange another location or to request approval to shut down the site from EPA. Given the facts that this monitor had the lowest design value in the MSA, that all minimum monitoring requirements in the MSA would still be achieved, that the monitor was abruptly requested to be removed by the location owner, and that there was insufficient time to request EPA approval of a situation beyond our control, the Department chose to close the site and amend the Air Monitoring Network accordingly.

We apologize for any deficiencies in addressing the Pb monitoring requirements at the Anniston Army Depot. Due to the permanent shutdown and removal of several emissions sources at the Anniston Army Depot, the total Pb emissions from this source have declined to 0.33 TPY over the last two years. Therefore, the Department was under the impression that Pb monitoring would not be required at this facility. We will be glad to work with you to provide you with any necessary information on this matter.



If you have any questions, please call Larry Brown at 334-271-7878 or email at lwb@adem.state.al.us.

Sincerely,

A handwritten signature in black ink, appearing to be 'RG' or similar initials, written over the word 'Sincerely,'.

Ronald W. Gore, Chief
Air Division
Alabama Department of Environmental Management

CC: *by email*

Jonathan Stanton, Director
Jefferson County Department of Health

Daniel E. Shea, Director
Huntsville Department of Natural Resources